Subject: FW: CPRA request (ECA.2019.10.13.a)
From: Kimberly Rodriguez <krodriguez@mycharterlaw.com>
Date: 10/18/19, 10:46 AM
To: "ralonzo@excelenciacharteracademy.org" <ralonzo@excelenciacharteracademy.org>
CC: "Sarah J. Kollman" <skollman@mycharterlaw.com>

Hello Ruben,

I apologize for the delay in responding, Sarah Kollman asked that I assist you with responding to this Public Records Act request. As Sarah notes, [redacted] has been harassing LA-area charters since the UTLA strikes. [redacted] is a blogger http://michaelkohlhaas.org/wp/ and [redacted] He is highly litigious and regularly makes PRA requests to public entities. So far he has been hostile to charters in general and to most of our clients. He has been known to bring his own copier to copy records and attends and records the Board meetings of one of our clients. Based on my interaction with him over the last few months, I recommend that Excelencia Charter Academy respond directly to [redacted] (versus our office responding on your behalf). When I am directly involved in responding to the PRA requests this has escalated the number of requests.

The term "native format" means the regular email format used. [redacted] is using this term to clarify that he does not want pdf'd emails. Also, [redacted] will require that original emails versus forwarded emails to preserve the metadata in the emails. As such, emails should be saved in a folder on your server or in a cloud server (e.g. Drop Box, Google Docs, etc) . If you would like our office to review the responsive emails please provide a copy of the folder to our office via zip file, Google Drive, DropBox, etc. However, as email review is time consuming some clients review and redact the bulk of the emails themselves and only forward emails where they question whether the email is responsive or exempt from production.

Due to very broad request made by [redacted] I recommend that the attached 14-day extension letter be sent on 10/23 indicating that an additional 14 days is necessary to make the initial determination of whether Excelencia has any responsive records and the expected date of production. I am also attaching the initial substantive response that should be sent on 11/6 once you determine how long it may take for you to gather, review and redact all responsive emails. In order to determine a reasonable production date you should determine how many emails may be responsive to the request and how long the review of these emails may take. If it is reasonable, you could set the expected production date for the end of December. If [redacted] pushes back on this production date you could reconsider whether the records can be produced earlier or in batches. Also, if the end of December comes and you are still not finished reviewing and redacting records you could indicate that additional time is needed to complete the review.

Let me know if you have any questions or would like to set up a call.